

# **EXHIBIT E**

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**From:** Jonathan Bright  
**Sent:** Friday, January 12, 2024 9:59 PM  
**To:** rak\_headwater@raklaw.com  
**Cc:** [SERVICE FR] Samsung-Headwater; qe-headwater103@quinnemanuel.com; Jeannet Santos  
**Subject:** RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel:

In relation to the supplemental response to Plaintiff's interrogatory No. 1 referenced below, Samsung has diligently pursued third party discovery and we notify you that Defendant Samsung intends to supplement its Invalidity Contentions with content from third party OpenWave specified in that supplemental response.

For purposes of notice and status as to third party discovery, Samsung expects to receive additional third party discovery responses in the coming weeks and may well further supplement its interrogatory No. 1 as well as its Invalidity Contentions with additional documents and things obtained as a result of that discovery.

Regards,

Jonathan

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**From:** Jeannet Santos <jsantos@fr.com>  
**Sent:** Friday, January 12, 2024 4:55 PM  
**To:** rak\_headwater@raklaw.com  
**Cc:** [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>  
**Subject:** Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel:

Attached for service, please find:

- **DEFENDANTS' SUPPLEMENTAL OBJECTIONS AND RESPONSES TO HEADWATER RESEARCH LLC'S FIRST SET OF INTERROGATORIES (NO. 1)**

The password to this document will be sent in a separate email.

Thank you,

**Jeannet T. Santos**, Sr. Litigation Paralegal

Supporting: Ashley A. Bolt, Brian P. Boyd, Erin P. Alper, Noah C. Graubart, & Steffen C. Lake

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**PUBLIC VERSION**

**“The Strength of the Team is each Member. The Strength of each Member is the Team.” –Phil Jackson**